

FILED

OCT 28 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

DIVISION

DREWA, JONATHAN C TM
Plaintiff

v

SAN ANTONIO ZOOLOGICAL
SOCIETY, INC.
Defendant

§ CASE NUMBER:
§ SA24CA1237OG
§
§
§
§ COMPLAINT
§
§

I

Plaintiff

COMES NOW, the Jonathan Christopher: Drewa competent, Sui Juris, as the authorized representative, and the Sole Beneficiary of the matter at hand, a decorated combat veteran, a sentient being, One of We the People invoking all the un-a-lien-able rights, appearing by special divine appearance, and do hereby respectfully declare intent to pursue relief

II

Defendant

The Defendant herein named the SAN ANTONIO ZOOLOGICAL SOCIETY INC is currently at the address: 3903 North Saint Mary's Street, San Antonio, Texas 78212

III

Jurisdiction and Venue

Jurisdiction is invoked Pursuant Under Article III of the Constitution, federal courts can hear "all cases, in law and equity, arising under this Constitution, [and] the laws of the United States..." US Const, Art III, Sec 2. The Supreme Court has interpreted this clause broadly, finding that it allows federal courts to hear any case in which there is a federal ingredient. *Osborn v. Bank of the United States*, 22 US 738 (1824).

Jurisdiction and Venue are invoked pursuant to Title 28 U.S. Code Section(s) 1330; 1331; 1343 (a) (1)(2)(3)(4); 1355 (a); 1357; 1367 (a); 1391 (a)(1); (b)(1); (c)(2); 1732; 2202; Title 42 U.S. Code Section(s) 1981; 1983. Furthermore Federal Question Jurisdiction grants subject matter jurisdiction to hear cause of action(s) regarding the violation(s) of rights protected by the Constitution of the United States of America and protected under the Americans with Disabilities Act (ADA). The venue is considered in the best interest of both parties due to geographical location.

IV

Complaint

- (i) The count number one (1) is for the Discrimination/violation of the right(s) with the protection of the Americans with Disabilities Act (ADA) *Pursuant to Americans with Disabilities Act; The Americans With Disabilities Act (ADA) 1990 - Pub. L. 101-336, § 2, July 26, 1990, 104 Stat. 328; Pub. L. 110-325, § 3, Sept. 25, 2008, 122 Stat. 3554. See Exhibit E*

- (ii) The count number two (2) is for the violation of the right(s) with the protection of the Constitution of the United States of America *Pursuant to The Constitution Of the United States of America, Amendments I, III, IV, V, IX, XIV right to privacy; The Constitution Of the United States of America Amendments V - "nor be deprived of life, liberty, or property, without due process of law;" See Exhibit E*
- (iii) The count number three (3) is for the Intentional Infliction and the extreme cause of Emotional Distress (IIED) *See Exhibit E*

Relief

- (i) For the cause of the violation of the right(s) under the Americans with Disabilities Act (ADA) is with the redress of the relief in the amount of the three hundred fifty thousand dollars (\$350,000)
- (ii) For the cause of the violation of right(s) under the Constitution of the United States of America is with the redress of the relief in the amount of the three hundred fifty thousand dollars (\$350,000)
- (iii) For the cause of the Intentional Infliction and extreme cause of Emotional Distress (IIED) is with the redress of the relief in the amount of the two hundred thousand dollars (\$200,000).
- (iv) For the cause of the damages is the redress of the relief in the sum of the nine hundred thousand dollars (\$900,000)

Exhibits

- (i) Exhibit A - video evidence of refused access to the Zoo

- (ii) Exhibit B - picture evidence (other)
- (iii) Exhibit C - evidence of purchased zoo tickets and refunded receipt
- (iv) Exhibit D - medical evidence of need for service animal (service dog)
- (v) Exhibit E - Unrebutted Affidavit of Truth; certified proof of service

By: Authorized Representative Jonathan Christopher
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*For: The Jonathan Christopher Drewa tm Estate
2000 S Hackberry Street unit 10438
San Antonio, Texas 78210
(210) 571-2989*

By the Authority of:

Maxims of law in Equity

Maxims of law in Commerce

The Declaration of Independence - "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness."

The Constitution Of the United States of America Amendments I, IV, V, IX, XIV - Implied right to privacy

Supported case law: Griswold v. Connecticut, 381 U.S. 479 (1965)

The Constitution Of the United States of America Amendment V - nor be deprived of life, liberty, or property, without due process of law;

The Constitution Of the United States of America Amendment XIV - No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law

The Americans With Disabilities Act (ADA) 1990 - Pub. L. 101-336, § 2, July 26, 1990, 104 Stat. 328; Pub. L. 110-325, § 3, Sept. 25, 2008, 122 Stat. 3554.

Supported by: Texas law and the ADA: "Texas law and the federal Americans with Disabilities Act (ADA) guarantee the right of a person who is blind or has other disabilities, including post-traumatic stress disorder (PTSD), to be accompanied by a trained service animal in all public places"

18 U.S. Code § 242 - Deprivation of Rights under the color of law

18 U.S. Code § 241 - Conspiracy against rights

42 U.S. Code § 1983 - Civil action for deprivation of rights